

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
KEYBOARD()DIVISION**

UNITED STATES OF AMERICA,		
Plaintiff,		
v.		CR
KEYBOARD(),		
Defendant.		

VOIR DIRE (CIVIL)

We are about to select a jury for the trial of this case that has been announced ready for trial. To assist the Court and the attorneys in that selection process, we are going to proceed with what is called “voir dire” examination.

The purpose of voir dire examination is to give the lawyers a full opportunity to inform themselves about the jury panel so that they may responsibly exercise their duties to their respective clients to select a fair and impartial jury for

the trial of this particular case. No one wishes to probe unnecessarily into your private affairs, but the lawyers need to know, and the parties are legally entitled to know some information about you. Therefore, please answer each question as fully and as accurately as you can. We need you to give your best, honest, and sincere effort to answer each question. The information you give in response to the court's and the lawyers' questions will be used only by the court and the lawyers to select a qualified jury for the trial of this case.

I am now going to request the courtroom deputy to call the roll of jurors who have been summoned to this courthouse for a term of jury service through a random selection process, and have been selected through a similar type random selection process to come into this courtroom as a possible jury venire, and who are now seated in the order in which that random selection process put you. As the courtroom deputy calls your name, would you please stand and tell us in a loud

voice the information requested on the card each of you has been given.

As I indicated a few minutes ago, we are commencing the trial of the case of Plaintiff v. **KEYBOARD()**. This case generally involves [insert summary of the case contained in the Pretrial Order].

Now, ladies and gentlemen, as indicated earlier, I am going to ask you some questions after which the attorneys will be allowed to ask you some additional questions, if they so desire. Please answer these questions completely and truthfully. If the answer is “Yes”, raise your hand and only give your name in a loud, clear voice when called upon to respond.

1. Has anyone read or heard anything about this case?
2. Is any juror familiar with the facts that may be involved in this particular case? How did you become familiar?
3. Does any member of the jury panel know of any reason why you may

be prejudiced for or against the government – or – for or against the

Defendant because of the nature of this particular case or otherwise?

In other words, is there anyone of you who could not be fair to both

sides in this case because this case involves allegations of

KEYBOARD()?

4. Are you related by blood or marriage to defendant KEYBOARD()?
5. Do you know Defendant KEYBOARD()?
6. Have any of you or any person related to any of you by blood or marriage ever been employed by the Defendant KEYBOARD()?
7. The attorneys in the case are Assistant U. S. Attorney KEYBOARD(), representing the United States of America, and KEYBOARD() representing Defendant KEYBOARD(). Do any of you know personally any of the attorneys in the case? Which one and how?

8. Are any of you members of the jury panel related by blood or marriage to any of the attorneys in this case?
9. Have any of you, or any members of your immediate family, ever been represented by any of the attorneys in the case or to your knowledge been involved in any matter in which any of these attorneys were involved?
10. Are any of you members of the jury panel related by blood or marriage to any of the other members of the jury panel?
11. Has anyone talked with you about this case or discussed it in your presence prior to your coming into this courtroom today?
12. Would any of you be the least bit hesitant promptly to report to me or the courtroom deputy should someone approach you about this case or talk to you about it while you are serving as a juror?

KEYBOARD() Enter proposed voir dire and any witness list.

13. Is there anyone who believes for whatever reason that they would be unable, if chosen to serve on the jury in this case, to be fair and impartial to both sides and to return a verdict based solely on the facts as you determine them to be from the evidence and the law as I give it to you to be applied to those facts?

14. Can any of you think of any other matter that you should call to the court's attention that may have some bearing on your qualifications as a juror or that may prevent you from rendering a fair and impartial verdict based solely on the evidence and my instructions as to the law?

15. We anticipate that this case will take **KEYBOARD()** days to try. Would this length of trial work an undue hardship on anyone?

I have now asked the questions I needed to ask. Now, the attorneys may ask you some questions. Please answer them fully and truthfully.